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**Arnold v. City of St. Joseph - copy of opposition suggestions - correspondence**

4 messages

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Wed, Jan 29, 2020 at 8:11 PM

To: "Greg Goheen (ggoheen@mvplaw.com)" <ggoheen@mvplaw.com>, Chris Heigle <CHeigle@batyotto.com>, Mark Beam-Ward <mbeamward@bkwflaw.com>, shannah@bkwflaw.com, cthomas@batyotto.com, Karen Brokesh <kbrokesh@mvplaw.com>

Hello all,

Attached please find a copy of my suggestions in opposition to the Library's dismissal motion, which was e-filed with the Court today. I am also reaching out to all of you because, as I indicated in my Complaint, I would like to return to the library to petition for another cause that I care about. I am currently volunteering to circulate the Medicaid expansion petition and would like to do so in front of the East Hills Library. While I would like to petition as I normally do, and do not believe that prior approval is necessary per the First Amendment, there is one place that I certainly do not wish to return: the St. Joseph slammer. Therefore, I am reaching out to all of you in advance so that I may know what activities/actions may lead me to the slammer so that I can avoid them. My first wish is a wish that seems, to my mind, to be contrary to the current library policy. I am not sure if the remainder of my wishes would lie outside of the current library policy, the wishes of mall security, and/or the wishes of the City or not.

I would like to:

- 1) circulate my petition on the external grounds of the East Hills Library to include the public and the private property (including the privately-owned portion of the sidewalk)
- 2) verbally and physically approach people (from any angle) and ask them to sign my petition
- 3) drive my car through the privately-owned vehicular pass-through in order to access and leave the Library
- 4) park my car in the parking lot utilized by library patrons
- 5) access the Library water fountain and restroom facilities
- 6) enter the Library to warm up during cold temperatures or cool down during hot temperatures (not to petition)

For the sake of clarity, I am not requesting the ability to block the ingress or egress of patrons and in general and not requesting the ability to physically pursue patrons in the moment *after they have said no*; however sometimes it is possible to forget a response and ask someone again in a different moment (i.e. on the way out) and I am requesting the ability to be able to make that mistake as well.

I would greatly appreciate the positions of your clients as to these issues. I wish to return to the Library for the purposes indicated in my Complaint, but, once again, I have no desire whatsoever to return to the Buchanan County Jail.

Moreover, clarifying that I have no intention of using this circumstance to attempt to interview witnesses regarding the incident on 1/30/2018 without an attorney present. I have every intention of being polite and respectful to library staff, and I would hope for the same in return.

Weather permitting, I should be in late this week or early next week.

Best Regards,